

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

BRIGITTE BURG,	§	
	§	
Plaintiff,	§	
	§	
v.	§	No.
	§	
LAW OFFICES OF THOMAS LANDIS and	§	
OXFORD LAW, LLC	§	
	§	
Defendants.	§	

PLAINTIFF’S COMPLAINT AND DEMAND FOR JURY TRIAL

BRIGITTE BURG (“Plaintiff”), through her attorneys, KROHN & MOSS, LTD., alleges the following against LAW OFFICES OF THOMAS LANDIS (individually “Landis”) and OXFORD LAW, LLC (“individually “Oxford”) (collectively “Defendants”):

INTRODUCTION

1. Plaintiff’s Complaint is based on the Fair Debt Collection Practices Act, 15 U.S.C. 1692 *et seq.* (“FDCPA”).
2. Defendants acted through its agents, employees, officers, members, directors, heirs, successors, assigns, principals, trustees, sureties, subrogees, representatives, and insurers.

JURISDICTION AND VENUE

3. Jurisdiction of this court arises pursuant to 15 U.S.C. 1692k(d), which states that such actions may be brought and heard before “any appropriate United States district court without regard to the amount in controversy.”
4. Defendants conduct business in the state of Texas, and therefore, personal jurisdiction is established.
5. Venue is proper pursuant to 28 U.S.C. 1391(b)(2).

PARTIES

6. Plaintiff is a natural person residing in Beaumont, Jefferson County, Texas.
7. Plaintiff is a consumer as that term is defined by 15 U.S.C. 1692a(3), and according to Defendant, Plaintiff allegedly owes a debt as that term is defined by 15 U.S.C. 1692a(5).
8. Both Defendants are debt collectors as that term is defined by 15 U.S.C. 1692a(6), and sought to collect a consumer debt from Plaintiff.
9. Defendants are national debt collection companies and with an office in Pennsylvania.

FACTUAL ALLEGATIONS

10. In approximately September 2011, Defendants began placing collection calls to Plaintiff seeking and demanding payment for an alleged debt.
11. Defendants called Plaintiff from 215-526-6200. *See* Exhibit A.
12. Defendants leave voicemail messages for Plaintiff if its calls are not answered. *See* Exhibit B, transcripts of two (2) messages left by Defendants.
13. Defendants' voicemails identify itself as either Oxford Law Office and Oxford Law Group. *See* Exhibit B.
14. Defendants' voicemails instruct Plaintiff to call Defendants at either 877-543-6151 or 215-526-6200. *See* Exhibit B.
15. The telephone numbers 877-543-6151 or 215-526-6200 are utilized by both Defendants.
16. Further, both Defendants hold out their offices as being located at 1210 Northbrook Dr Ste 300, Feasterville Trevose, Pennsylvania 19053.
17. Upon information and belief, Defendant's are related and or affiliated with each other and collect on identical accounts.
18. Defendants also left a message that failed to inform Plaintiff that the communication is from

a debt collector. *See* Exhibit B.

COUNT I
DEFENDANT VIOLATED THE FAIR DEBT COLLECTION PRACTICES ACT

19. Defendants violated the FDCPA based on the following:

- a. Defendants violated §1692e(10) of the FDCPA by using false representation or deceptive means to collect a debt.
- b. Defendants violated §1692e(11) of the FDCPA by failing to inform Plaintiff that the communication is from a debt collector.

WHEREFORE, Plaintiff respectfully requests judgment be entered against Defendants for the following:

20. Statutory damages pursuant to the Fair Debt Collection Practices Act, 15 U.S.C. 1692k,
21. Costs and reasonable attorneys' fees pursuant to the Fair Debt Collection Practices Act, 15 U.S.C. 1692k
22. Any other relief that this Honorable Court deems appropriate.

RESPECTFULLY SUBMITTED,

By: /s/ Adam T. Hill
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DEMAND FOR JURY TRIAL

PLEASE TAKE NOTICE that Plaintiff, BRIGITTE BURG, demands a jury trial in this case.

VERIFICATION OF COMPLAINT AND CERTIFICATION

STATE OF TEXAS

Plaintiff, BRIGITTE BURG, states the following:

1. I am the Plaintiff in this civil proceeding.
2. I have read the above-entitled civil Complaint prepared by my attorneys and I believe that all of the facts contained in it are true, to the best of my knowledge, information and belief formed after reasonable inquiry.
3. I believe that this civil Complaint is well grounded in fact and warranted by existing law or by a good faith argument for the extension, modification or reversal of existing law.
4. I believe that this civil Complaint is not interposed for any improper purpose, such as to harass any Defendant(s), cause unnecessary delay to any Defendant(s), or create a needless increase in the cost of litigation to any Defendant(s), named in the Complaint.
5. I have filed this Complaint in good faith and solely for the purposes set forth in it.
6. Each and every exhibit I have provided to my attorneys which has been attached to this Complaint is a true and correct copy of the original.
7. Except for clearly indicated redactions made by my attorneys where appropriate, I have not altered, changed, modified or fabricated these exhibits, except that some of the attached exhibits may contain some of my own handwritten notations.

Pursuant to 28 U.S.C. § 1746(2), I, BRIGITTE BURG, hereby declare (or certify, verify or state) under penalty of perjury that the foregoing is true and correct.

4. 18. 2012

Date


BRIGITTE BURG